

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

---

Coalition for Open Democracy, League of  
Women Voters of New Hampshire, The  
Forward Foundation, McKenzie Nykamp  
Taylor, December Rust, Miles Borne, by his  
next friend Steven Borne, Alexander Muirhead,  
by his next friend Russell Muirhead, and Lila  
Muirhead, by her next friend Russell Muirhead,

Plaintiffs,

vs.

David M. Scanlan, in his official capacity as  
New Hampshire Secretary of State, and John  
Formella, in his official capacity as New  
Hampshire Attorney General,

Defendants.

---

Civil Action No. 1:24-cv-00312

**ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, Coalition for Open Democracy, League of Women Voters of New Hampshire, The Forward Foundation, McKenzie Nykamp Taylor, December Rust, Miles Borne, Alexander Muirhead, and Lila Muirhead (“Plaintiffs”) respectfully moves this court for an order admitting John T. Montgomery to the bar of this Court, *pro hac vice*, for the purpose of representing the Plaintiffs in the above-captioned case. Mr. Montgomery is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Mr. Montgomery to appear before this Court.

2. Mr. Montgomery is a member in good standing of the bar of Massachusetts and various federal courts, he is not suspended or disbarred in any jurisdiction or involved in any

disciplinary proceedings, and he has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Mr. Montgomery *pro hac vice* in the above-captioned case.

4. Defendants, through counsel, assent to this motion.

WHEREFORE, the Plaintiffs, Coalition for Open Democracy, League of Women Voters of New Hampshire, The Forward Foundation, McKenzie Nykamp Taylor, December Rust, Miles Borne, Alexander Muirhead, and Lila Muirhead, respectfully request that this Honorable Court:

A. Grant this Motion for Admission *Pro Hac Vice* of John T. Montgomery;  
and

B. Grant such other and further relief as may be just and equitable.

Date: October 10, 2024

Respectfully submitted,

/s/ Henry R. Klementowicz

Henry R. Klementowicz (N.H. Bar No. 21177)

Gilles R. Bissonnette (N.H. Bar No. 265393)

AMERICAN CIVIL LIBERTIES UNION OF NEW  
HAMPSHIRE FOUNDATION

18 Low Avenue

Concord, NH 03301

(603) 333-2201

henry@aclu-nh.org

gilles@aclu-nh.org

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that he has electronically filed this date the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. This filing is available for viewing and downloading from the ECF system.

Date: October 10, 2024

/s/ Henry Klementowicz

Henry R. Klementowicz